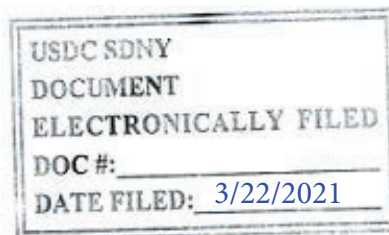


As: Letter Motion for Reappointment of pro bono counsel

Date: 1 / 21 / 2021



January 18, 2021

The Honorable Nelson S. Roman  
United States District Court judge  
Southern District of New York  
300 Quarropas Street  
White plains, New york 10601

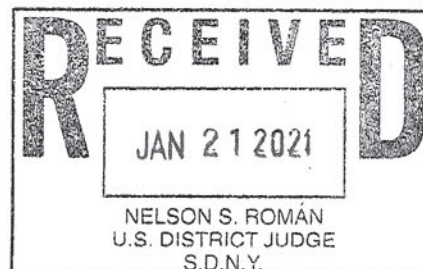
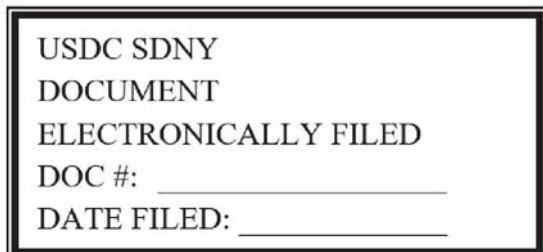
Re: Unites states V. Willie Sims, 19 Cr.857(NSR)  
Request for motion Pursant to 18 U.S.C 3582(C) 1(A)

Dear Judge Roman:

Please accept this letter motion in advance as an request for my current defense counsel Josephe Facciponti, to continue representing me after sentencing and file a motion on my behalf for compassionate release pursuant to 18 U.S.C 3582(c)(1)(A) . This section provides that a sentencing court may reduce a term of imprisonment after consideration of the factors set forth in section 3553 (a) to the extent they are applicable, if it finds that extraordinary and compelling reasons warrant such a reduction.

Its my understanding for the reasons that follow extraordinary and compelling circumstances in combination with the 18 U.S.C 3553(a) factors exist for the courts to exercise its disrection in granting me compassionate release. This application for release/reduction of sentence will be predicated as a result of the Covid 19 pandemic, along with my detailed medical history of having one kidney , and suffering from a hereditary polcystic kidney disease .Medical documentation has been presented to probation for the purpose of my (PSI) report, that I have stage 2 chronic kidney disease (CKD)2 . My medical documentation along with information listed on the CDC website confirms that due to my kidney issues Im at incresed risk of servere illness due to Covid 19. The National kidney foundation webstite recommended that the best way for kidney disease suffers to protect them self from Covid 19 is prevent exposure .

The Covid 19 virus is constantly evolving and a new, more contagious strain is already spreading in New York as numbers continue to rise again . Heath officials confirmed that this new strain is <sup>than</sup> known to spread 70% faster ~~than~~ the earlier version of the virus .The crowded nature of jail and



prisons in this case the (BOP) poses a greater risk that the Covid19 contagion , once it gains entry will rampantly spread and can quickly spiral out of control.

please see attached medical documents.

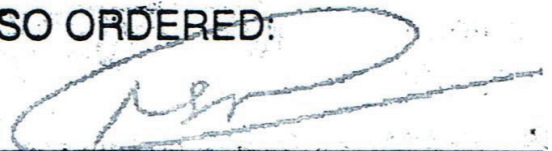
Respectfully submitted



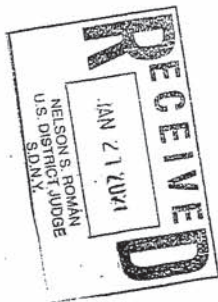
Deft. Sim's application is denied without prejudice to renew post imposition of sentencing. Clerk of Court requested to terminate the motion (doc. 179). Deft's counsel is directed to mail a copy of this endorsement to Deft. and file proof of service on the docket.

Dated: March 22, 2021

SO ORDERED:



HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE



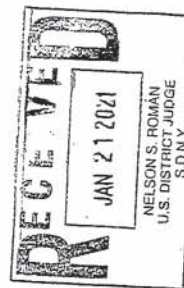
Willie Sims #2020-01259  
ORANGE COUNTY, NY  
110 WELLS FARM RD.  
GOSHEN, NEW YORK 10924



WESTCHESTER NY  
19 JAN 2021 PM



Honorable Judge Nelson S. Roman  
U.S. District Court Southern District of NY  
300 Quarropas Street  
White Plains NY 10601



10601-414000